

## GSA POLICY AND PROCEDURE

SUBJECT: GSA Records Management Program

1. Purpose. This Directive establishes principles, authorities, responsibilities, and requirements for managing GSA's records.
2. Background. The Federal Records Act of 1950, as amended (44 U.S.C. § 3101), requires all Federal agencies to make and preserve records containing adequate and proper documentation of its organization, functions, policies, decisions, procedures, and essential transactions. These records must be managed according to applicable authorities (refer to Appendix A for a citation of authorities).

The Federal Records Act also states: "The head of each Federal agency shall establish and maintain an active, continuing program for the economical and efficient management of the records of the agency" (44 U.S.C. § 3102). Essential elements of Records Management Programs customarily include:

- issuing up-to-date records management directives;
- training those responsible for the implementation of the agency's Records Management Program; and
- evaluating the agency's Records Management Program to ensure adequacy, effectiveness, and efficiency.

Records serve a number of purposes, including:

- planning administrative and program needs;
- documenting GSA activities;
- protecting the agency's legal and financial rights;
- providing for adequate oversight by Congress and other authorized agencies;
- documenting the agency's history; and
- providing for continuity of operations during an emergency or disaster.

Records are critical to an organization's effective and efficient functioning in accordance with the law.

3. Scope and applicability. This Directive provides policies and procedures for identifying and managing GSA records. It addresses all records created or received by GSA under Federal law or in connection with transacting public business. Refer to

Appendix B of this order for the definition for types of records. This Directive establishes specific requirements to:

- provide effective and efficient records management to support GSA's programs and mission;
- preserve official GSA records in compliance with applicable statutory and regulatory requirements; and
- promote appropriate access to information by GSA staff, GSA affiliates, customers, and the general public.


This Directive applies to all GSA services, staff offices, regions, and GSA employees. The Office of Inspector General may exempt itself from any records management processes and policies issued by GSA that, in the judgment of the Inspector General, may conflict with the Office of Inspector General's mission or limit its independence, unless the law prohibits such exemption. (Inspector General Reform Act of 2008 (5 U.S.C. App. 3)).

4. Cancellation. This Directive cancels CIO P 1820.1 CHGE 4, GSA Records Maintenance and Disposition System, dated June 8, 2007.

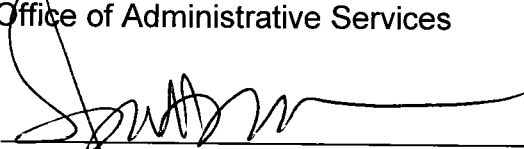
5. Nature of revisions. This Directive reflects changes to the:

- GSA Records Management Program;
- Use of electronic records versus paper records as the primary media for records preservation; and
- Office of Mission Assurance's responsibility to manage the vital records program and its associated policy.

6. Signature.

  
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Chief Administrative Services Officer  
Office of Administrative Services

3/7/14  
Date

  
SONNY HASHMI  
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Date

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## **Introduction**

GSA's Records Management Program governs GSA's statutory responsibility to make and preserve agency records by working closely with GSA employees and the National Archives and Records Administration (NARA). National Archives and Records Administration is the Government's oversight agency responsible for appraising all Federal records, approving their disposition, evaluating Records Management Programs, and storing permanent records.

Federal law requires that every agency establish a comprehensive Records Management Program and "...issue a directive(s) establishing program objectives, responsibilities, and authorities for the creation, maintenance, and disposition of agency records" (36 CFR 1220.34(c)). For a full listing of all relevant statutory authorities see Appendix A.

This GSA Directive provides policies and procedures for GSA's Records Management Program. The directive sets forth the program structure, roles and responsibilities and GSA's records management processes. For additional questions, contact your Records Management Coordinator.

Note: If an office needs an exception to the Records Management Policy, i.e., to control records separately or differently, any exceptions should be discussed with the Agency Records Officer before they are put into effect.

## **Records Management Program Structure**

The Office of Administrative Services is responsible for GSA's Records Management Program and will work closely with the Office of the Chief Information Officer. Positions performing GSA's records management work throughout Central and Regional offices are outlined below.

### **Agency Records Officer**

- GSA's Subject Matter Expert on Records Management Authority
- Liaison to National Archives and Records Administration
- Coordinates with the Chief Information Officer

### **Senior Records Officer**

- Directly Supports Offices and Regions
- Liaison and support for Records Management Coordinators
- Coordinates with the Agency Records Officer

### **Records Management Coordinator**

- Knowledge of area's records and file plan
- Answer records questions for local staff
- Works with Senior Records Officer

## **Handling, Storage, Retention and Destruction of Records**

### **Determining record status**

In developing recordkeeping requirements, the first step is to determine which documentary materials need to be identified as records and preserved to ensure complete and accurate documentation. Preserve records by filing, storing, or otherwise systematically maintaining them. Important items to keep in mind are outlined below.

- Work-related personal files can be difficult to distinguish from agency records. GSA employees must take care to keep personal files separate from agency records.
- In the event a personal file contains agency records material, GSA employees must extract official information included in personal files and copy or place it in an agency record file.
- Occasionally, the courts may determine that some materials considered personal files are agency records, depending on the circumstances surrounding their creation, maintenance and use, and disposition.
- The courts have developed legal decisions regarding these circumstances in deciding Freedom of Information Act (FOIA) cases. The meaning of "agency record" for purposes of FOIA is broader than the definition of "records" found in 44 U.S.C. 3301, cited in par. 1a, Appendix B.

### **Handling records**

In conducting business, every GSA employee creates records in a variety of media. The following instructions are best practices on the proper handling of records.

- Managing records effectively ensures that permanent records become part of the National Archives and Records Administration (NATIONAL ARCHIVES AND RECORDS ADMINISTRATION) while other records and information of temporary value are retained for as long as needed and then properly disposed.
- Documents stored in "the cloud" or in any type of Social Media site might be considered records. Employees must ensure that GSA business-related internet and intranet postings, such as social media postings, Chatter postings, and collaborative worksite postings containing records are maintained in accordance with GSA's recordkeeping requirements.
- Accessing records are a part of every GSA employee's job. However, employees may never remove records, regardless of media, from GSA without authorization from their supervisor. Employees involved in day-to-day GSA

business must equally receive authorization before accessing and/or removing electronic files needed for working offsite.

- Employees who leave GSA cannot remove any non-personal records without their supervisor's approval and must return records not approved for removal before they leave the agency.
- It is common to maintain all types of information on a single computer at a single location. However, GSA employees must maintain personal papers, work in progress, and non-record materials separately from GSA records.
- The Records Management Coordinator (explained later in this Directive) must identify retired records stored within a region and disclose them to the Senior Records Officer if the location contains more than 20 linear feet; more than 20 containers of retired physical records, or more than 1 gigabyte of retired electronic records. Associated inventory descriptions and manifests (GSA Form 3711) of the records should likewise be shared.
- Offices that handle classified records must ensure they are maintained separately from unclassified records. Classified records should be stored in a secure location, whether paper or electronic. Records with classified portions must be stored and handled according to the Information Security handbook (CIO P 2100.1H) for the record with the highest classification level. Filing of unclassified and classified information is restricted to that information directly supporting, explaining, or documenting the record of the action and must be kept separately. In these cases, it is advisable to prepare a cross-reference page and place it in the unclassified file to indicate where the related classified records are located.
  - Information on the storage and destruction of classified information is available from the GSA Senior Agency Information Security Officer (SAISO) in the Office of the Chief Information Officer (OCIO).

### Storage of records

To safely preserve records, storage is the first and best means of defense. Proper storage of both physical and electronic records is vital to being able to search and retrieve them. For specific National Archives and Records Administration regulations on the storage of records, go to <http://www.archives.gov/records-mgmt/storage-standards-toolkit/file8.pdf>. To determine if a record is permanent or temporary, use the GSA Records Schedule (<http://insite.gsa.gov/portal/content/500582>).

- Permanent Records
  - Permanent Records are records, determined by the National Archives and Records Administration, to be permanent because of their continuing

administrative, legal, scientific, or historical values. These records must be stored in a way that allows for their complete and organized transfer to National Archives and Records Administration.

- Only a small percentage of records are identified and scheduled as being "permanent." When transferring permanent records to National Archives and Records Administration, GSA transfers all legal custody of permanent records to National Archives and Records Administration.
- Electronic and audio/video records that have permanent worth should be discussed with the responsible Senior Records Officer.
- Temporary and permanent records should be segregated. Records and non-records should be segregated.
- Temporary Records
  - Name and store temporary records so they can be located and easily retrieved as needed.
  - Segregate temporary and permanent records. Separate records and non-records, as well.
  - When electronic data systems are decommissioned, replaced, or significantly changed, archive records in electronic data systems in a non-proprietary manner. Archiving the records in this manner will ensure that they are still "readable" and can be destroyed or transferred as set forth by this policy. Applicability on legacy systems will be analyzed on a case by case basis, taking in consideration the cost and complexity of modifying a legacy system.
    - The term "Archived" is not the same as the term "Backed-up."  
Customarily, "backing up" data refers to making an electronic copy of the data elsewhere for reinstatement if the original data is lost/destroyed.  
"Archiving" refers to storing a copy of the data in a non-proprietary format for easy retrieval after the originating system is no longer available. Even back-ups would be of no use in retrieving the records.
  - Every box of physical records stored locally, or at a professionally managed storage center, must have a box manifest in it (GSA Form 3711 or equivalent). Each distinct group of boxes stored must be clearly and sequentially numbered on the outside of each box with a master copy of all of the box manifests in the group's first box.
  - Send an electronic version of the master copy of all box manifests to the appropriate Senior Records Officer along with the associated storage location. Records sent to Federal Records Centers also require a Standard

Form 135 – Records Transmittal and Receipt. The Standard Form 135 should be completed by the records owner and forward to the Records Management Coordinator, who will send the form electronically to the appropriate Senior Records Officer.

- Store Manifests (GSA Form 3711 or equivalent) for archived electronic records in an area accessible by the local Records Management Coordinator. These manifests may be needed during annual records inventories or by others authorized to search for and to access the records.

### Retention of Records

Records, regardless of media, will be retained in accordance with the timeframes approved by the Archivist of the United States in GSA Records Schedules.

- Records that have a retention period of less than 180 days must be disposed of when no longer needed.
- Records that have a retention period longer than 180 days must be properly stored in an organized records management system and transferred to the Federal Records Center when no longer active.
- Records must not be destroyed before the end of their retention period. If there is a conflict with any authorities, they will be resolved by the Office of General Council.
- The GSA Records Schedule is found at:  
<https://insite.gsa.gov/portal/content/500582>

### Destruction of records

Office file plans should contain accurate and up-to-date destruction authorities and retention periods for all records and non-records maintained in an office. Records should not be destroyed if there is a reasonable expectation that they will be needed for litigation or any investigation. Additionally, records should not be destroyed without previous approval of the records owner, Office of General Counsel and the Office of Inspector General.

- Temporary records (records that are not to be kept permanently), must be destroyed in a timely manner. However, agency records, physical or electronic, are not to be deleted or otherwise destroyed, except in accordance with this policy, which is consistent with National Archives and Records Administration regulations. GSA's authority to destroy records comes directly from the Archivist of the United States, who has approved GSA's Disposition Schedule. Records



destruction cannot be done before the end of their retention period. Conflicts with any authorities will be resolved by the Office of General Counsel.

- Records covered by the Privacy Act are considered sensitive and offices must certify that they have been properly destroyed.
- Personal records and non-record information may be destroyed or removed at the discretion of the associate accumulating the information.
- All information systems, websites, mobile computing applications, and any other electronic systems containing GSA records must have disposition plans and be referenced in file plans.
- Large-scale destruction of records, regardless of media, such as those requiring assistance of outside companies, should not be done without the knowledge and sign-off by the local Records Management Coordinator.
- If an employee or contractor knows of any actual or potential threat to records (e.g., removal, alteration, or destruction), contact the Office of Inspector General.
  - The Office of Inspector General or the Agency Records Officer must contact National Archives and Records Administration, as required by 44 U.S.C. 2905 and 3106 and 36 CFR 1230.14.
  - National Archives and Records Administration will assist the agency in the recovery of any unlawfully removed records, including contacting the Attorney General, if necessary.
  - Follow all agency internal reporting requirements, which may include reporting the threat to the agency's Office of General Council and to its Office of Inspector General.

## **Transferring Records**

### **Records Transfers to National Archives and Records Administration**

- The National Archives and Records Administration permanently preserve select historical records or records of continuing value (e.g. rights and interests). Permanent records are GSA documentary materials that are determined by National Archives and Records Administration to have sufficient historical or other value to warrant their continued preservation by the Government.
  - Only a small percentage of records are "Permanent."
  - When transferring permanent records to National Archives and Records Administration, GSA transfers all legal custody of those records to National Archives and Records Administration.
  - National Archives and Records Administration ensures preservation of permanent records and provides reference service to GSA and its customers.
  - National Archives and Records Administration will withhold information that is restricted under statute from the public.
- The Federal Records Centers operate under an Office of Management and Budget approved reimbursable program as the Records Center Program and are a functional operation within National Archives and Records Administration. These Centers provide low cost off-site storage of records for all Federal agencies.
  - Federal Records Centers provide temporary storage and reference services for records that are needed infrequently by the customer but are not yet eligible for disposal or transfer to the National Archives and Records Administration.
  - GSA records stored in a Federal Records Center remain in the legal custody of GSA.
  - The Senior Records Officers in conjunction with Records Management Coordinators are responsible for transferring records to the Federal Records Centers. Archives and Records Centers Information System (ARCIS) is a web-based system used by the Federal Records Centers to replace the need to mail or email forms for the transfer of records.

## **Responsibilities**

### **GSA employees**

All GSA employees are records custodians and are responsible for maintaining their records in accordance with Federal laws and regulations and GSA's records management policy. Employees have the following specific responsibilities:

- Understand privacy and security considerations. No record of any media, accessible by an employee or contractor, may be viewed without a clear need to know of the information contained in the record. The exception being when information contained in records—regardless of any media—is intended to be open to being viewed by anyone.
- Complete records management training every Fiscal Year (FY). Records management training courses are available on GSA's Online University (see Appendix C).
- New employees must take the training within the first 30 days of their employment start date. Records management training courses are available on GSA's Online University (see Appendix C).
- Maintain adequate records. Every employee is responsible for preserving records that adequately document the organization, functions, policies, procedures, decisions and essential transactions of GSA in their area of responsibility. Records can exist in email, Chatter, share drives, Google drive, chat within Gmail, file cabinets, and/or desks.
- Records (including those in email) that have a retention period longer than 180 days must be properly stored in an organized records management system. Adequate records also protect the government's legal and financial rights.
- Employees may never remove records, regardless of media, from GSA including when they are leaving the employment of GSA, without authorization from their supervisor, acting in accordance with GSA policies and procedures. Employees involved in day-to-day GSA business must equally receive authorization before accessing and/or removing electronic files needed for working offsite.

### **Signatory official**

- Signatory officials are those employees whose signature is customarily required to make obligations and commitments on behalf of the agency. The following are signatory officials:
  - Administrator
  - Deputy Administrator
  - Regional Administrators

- Head of Service and Staff Offices and other officials above the Division Director or equivalent level
  - Division Directors
  - Branch Chiefs
  - Section Chiefs
  - Contracting Officers; and
  - Career Civil Service associates and political appointees serving in positions equal to or comparable to those listed above.
- Signatory officials have the additional responsibility to send record copies of documents signed by them to the office(s) responsible for the functions to which the signed document applies. The responsible offices must ensure that records are disposed of as the law requires.
  - Contracting Officers, Contracting Officer's Representative and Contract Oversight Managers are responsible for including in all contracts and agreements wording set forth by National Archives and Records Administration. Visit the National Archives and Records Administration website for the required language: <http://www.archives.gov/records-mgmt/handbook/records-mgmt-language.html>.

#### Administrator of General Services

- The Administrator of General Services is responsible for creating and preserving records that adequately and properly document the organization, functions, policies, decisions, procedures, and essential transactions of GSA.
- This role is delegated to the Chief Administrative Services Officer in the Office of Administrative Services (see ADM 5440.654) <https://insite.gsa.gov/portal/content/567154>.

#### Chief Administrative Services Officer

The Chief Administrative Services Officer, Office of Administrative Services, is responsible for the GSA National Records Management Program and provides GSA agency-wide leadership, planning, policy, and oversight of records management. The Chief Administrative Services Officer's responsibilities include:

- Incorporating records management requirements and policies into GSA's policy and planning framework.
- Designating GSA's Agency Records Officer.
- Communicating agency-wide records management federal requirements and agency goals, policies and procedures.
- Designating GSA's Records Branch Chief.

- Serving as the Senior Agency Official for Records Management.

#### GSA Agency Records Officer

The Agency Records Officer is GSA's subject matter expert for records management policy and National Archives and Records Administration regulations. The Agency Records Officer's responsibilities include:

- Providing guidance on the day to day agency recordkeeping requirements outlined in 36 CFR § 1222.22, Subpart B.
- Serving as the official GSA Records Management custodian of GSA's retired records to the National Archives and Records Administration.
- Serving as the point of contact for Records Management related issues to other Federal agencies, including the Office of Management and Budget (OMB), the Government Accountability Office (GAO), the Department of Justice (DOJ) and National Archives and Records Administration.
- Developing agency-wide records management policies and procedures.
- Coordinating and approving records schedules changes and the transfer of permanent records to National Archives and Records Administration.
- Providing guidance on policy and compliance to GSA organizations on establishing and maintaining effective records management practices.
- Representing GSA on the Federal Records Council and in other Federal records organizations.
- Managing reporting requirements for the Office of Management and Budget and the National Archives and Records Administration.
- Maintaining National Archives and Records Administration Records Management Certification.

#### Senior Records Officer

- A Senior Records Officer is responsible for implementing Records Management policy and procedures within an area of responsibility, with the exception of independent offices, who will work with Senior Records Officers at their discretion. A list of Senior Records Officers and Records Management Coordinators are available on InSite at <https://insite.gsa.gov/portal/content/500582>.

- One Senior Records Officer is assigned to the Federal Acquisition Service (FAS), one to the Public Buildings Service (PBS), and one to Central Office (covering all staff and independent offices).
- In addition, Senior Records Officers are assigned to cover the regions in a zonal capacity. Offices within the regions that operate essentially as extensions of the Central Office, should adhere to the agreed upon procedures and decisions of the Senior Records Officer responsible for the Central Office, unless an agreement exists between the Senior Records Officer of the Region and the Senior Records Officer of the Central Office.
- Senior Records Officers that reside in a regional location may also serve as that region's Records Management Coordinator, if requested by the Regional Administrator.
- Senior Records Officer's responsibilities include:
  - Assisting in the planning and implementing of information technology used for records management solutions to make sure they conform to Federal statutory requirements, regulatory requirements and GSA policy.
  - Provide the requirements for records compliance, if records exist in an electronic data system, if it is a system of record.
  - Supporting their area of responsibility in developing file plans; and folder and file naming and indexing conventions.
  - Providing briefings to the Signatory Officials in their area of responsibility during the third quarter of each fiscal year.
  - Conducting exit briefings for senior officials (signatories above the level of Division Director) on the appropriate disposition of the records, including email, under their immediate control and document the briefings via emails to the departing officials and to the local Records Management Coordinator.
  - Providing a complete records inventory and file plan review to the Agency Records Officer every three years, due every third November, starting November 2014.
  - Advising and supporting the Records Management Coordinators on records management issues and promulgating records management policies and procedures.
  - Maintaining National Archives and Records Administration Records Management Certification.

## Regional Administrator

Regional Administrator's responsibilities include:

- Ensuring the Records Management Coordinator maintains a records management plan (refer below for a description of the Records Management Coordinator). This plan consists of the local file plan, records maintenance procedures, electronic folder and file naming conventions, a local inventory of records, and security precautions.
- Designating at least one Records Management Coordinator for their region and forwarding the name to the region's Senior Records Officer within 30 days of the designation. If the designated Records Management Coordinator leaves, a new Records Management Coordinator must be appointed within 60 calendar days.
- Verifying the designated Records Management Coordinator has the appropriate authority and ability to perform their required responsibilities. This includes training, skills, resources, and time.
- Overseeing and carrying out the records management duties of this policy and procedure, such as having up-to-date file plans in place by appointing appropriate staff (in addition to the Records Management Coordinator), and assigning responsibility to a sufficient number of staff to ensure statutory requirements are fulfilled.
- Implementing procedures so records and other types of required documentary materials are protected from theft, loss, and unauthorized access or destruction by current and departing officials, employees, or other agents at GSA.
- Creating those records needed to ensure adequate and proper documentation of their organization.

## Head of Service and Staff Offices

Head of Service and Staff Office's responsibilities include:

- Having their Records Management Coordinator maintain a records management plan (refer below for a description of the Records Management Coordinator). This plan consists of the local file plan, records maintenance procedures, electronic folder and file naming conventions, a local inventory of records, and security precautions.
- Designating at least one Records Management Coordinator for each office and location and forwarding that name to the Office's Senior Records Officer within 30 days after designation. If the designated Records Management Coordinator

leaves, a new Records Management Coordinator must be appointed within 60 calendar days.

- Verifying that the designated Records Management Coordinators have the appropriate authority and ability to perform their required responsibilities. This includes training, skills, resources, and time.
- Overseeing and carrying out the records management duties of this policy, such as having up-to-date file plans in place by appointing appropriate staff (in addition to the Records Management Coordinator), and assigning responsibility to a sufficient number of staff to ensure statutory requirements are fulfilled.
- Implementing procedures so records and other types of required documentary materials are protected from theft, loss, and unauthorized access or destruction by current and departing officials, employees, or other agents at GSA.
- The heads of the following offices are required to designate a Records Management Coordinator:

Federal Acquisition Services (FAS) Central and Regional Office

Office of Strategy Management  
Office of Travel, Motor Vehicle, and Card Services  
Office of Administration  
Office of General Supplies and Services  
Office of the Controller  
Office of Integrated Technology Services  
Office of the Chief Information Officer  
Office of Assisted Acquisition Services  
Office of Acquisition Management  
Office of Customer Accounts and Research

GSA— Staff Offices—Central and Regional Offices

Office of Administrative Services  
Office of the Chief Financial Officer  
Office of the Chief People Officer  
Office of General Counsel  
Office of Small Business Utilization  
Office of Governmentwide Policy  
Office of the Chief Information Officer  
Office of Congressional and Intergovernmental Affairs  
Office of Communications and Marketing  
Office of Citizen Services and Innovative Technologies  
Office of Civil Rights  
Office of Mission Assurance



### Regional Administrators

### Independent Offices

Office of Inspector General  
Civilian Board of Contract Appeals

### Public Buildings Service (PBS) Central Office and Regional Offices

Office of Client Solutions  
Office of Acquisition  
Office of Real Estate Acquisition  
Office of Budget and Financial Management  
Office of Facilities Management and Services Program  
Office of Real Property Asset Management  
Office of Design and Construction

### Records Management Coordinator

Records Management Coordinator's responsibilities include:

- Supporting the records management program within their area of responsibility through the knowledge of their areas programmatic, administrative records and records inventory.
- Knowing the agency's records management policies, plans, types, and dispositions. The timely transfer of permanent records to National Archives and Records Administration.
- Identifying record types in use within their area of responsibility, ensuring records retention and disposition instructions are communicated to records custodians, and promulgating the most responsive and cost-effective means for managing records.
- Segregating records of independent offices that require special handling, such as "Law Enforcement Sensitive," and making appropriate accommodations for such records, such as using generic descriptions when transferring to National Archives and Records Administration.
- Completing the advanced records management training course in GSA's Online University each fiscal year.
- Establishing office-wide electronic file and folder naming conventions and procedures so that records are maintained in such a manner that they are readily retrievable, and disposed of in accordance with the established agency file plan.

- Offices within regions that operate essentially as extensions of the Central Office should adhere to the Central Office naming convention, unless both the Central Office Head and the Regional Administrator mutually agree to adhere to a regional naming convention.
- Supporting Senior Records Officers with:
  - Records inventories and reporting requirements.
  - Draft records schedule change requests for records created and maintained by their organization that do not exist in the GSA File Plan.
  - Review file plans and procedures during the three year records inventory process to ensure file plan(s) is/are current.
  - Notifying Senior Records Officers of opportunities to assist in the planning and implementing of information technology used for records management solution.
- Records Management Coordinators for the Office of Inspector General and Civilian Board of Contract Appeals have the additional authority to coordinate with the Agency Records Officer directly on all record management matters at all levels.

#### Chief Information Officer (CIO)

The Office of the CIO is responsible for incorporating recordkeeping requirements provided by OAS into GSA's electronic systems planning, design, acquisition, implementation and maintenance. Contemporary records creation and management primarily exist in electronic format. Electronic data systems house the majority of GSA's official record material, whether it is distributed across databases or in single files such as Adobe or Microsoft Word documents. Current records management laws and executive orders define specific responsibilities for offices that design, develop and manage electronic systems. The CIO's main recordkeeping responsibilities per federal law, OMB Circulars and OMB Directives include:

- Establishing procedures for addressing records management requirements, including recordkeeping requirements and disposition before approving new electronic information systems or enhancements to existing systems. Reference 36 CFR 1236.10.
- Incorporating records management and archival functions into the design, development, and implementation of information systems. Reference OMB Circular A-130, par. 8a (k).

- Incorporating recordkeeping requirements into all GSA investments during the capital planning process. Reference OMB Circular A-11.
- Implementing and enforcing applicable records management procedures, including requirements for archiving information maintained in electronic format, particularly in the planning, design, and operation of information systems. Reference Paperwork Reduction Act, §3506 par.(f).
- Managing the systems that contain permanent electronic records in an electronic format by December 31, 2019. Storing all permanent and temporary email records in an accessible electronic format by December 31, 2016. Reference OMB/ National Archives and Records Administration Directive M-12-18.

Additionally, Information Technology manager's responsibilities include:

- Working with Records Management Coordinators and Senior Records Officers to establish and update records schedules and record management requirements for electronic systems.
- Implementing proper record management procedures for existing information systems and verifying record management requirements are included in any proposed system; specifically the use of National Archives and Records Administration's General Records Schedule 20 "Electronic Systems."
- Incorporating Records Management (records capture, retrieval and retention according to GSA and National Archives and Records Administration disposition schedules) and archival functions (or manual archival processes) into the design, development, and implementation of the information system. This task should be performed by including the appropriate Records Management Coordinators and Senior Records Officers. Every electronic data system developed or acquired for the agency requires a Disposition Plan approved by an agency Senior Records Officer.
- Developing Disposition Plans and associated procedures for archiving data in a non-proprietary format, when data needs to be saved beyond the life of the system where it is stored. These systems include information systems, websites, mobile computing apps, and any other electronic system containing GSA records.
- Working with Records Management Coordinators and Senior Records Officers to transfer permanent records to National Archives and Records Administration in accordance with approved records schedules and National Archives and Records Administration requirements.
- Incorporating records management and archival functions (or manual archival processes) into any system acquired or developed, and including the Records

Management Coordinator and Senior Records Officer for record management in the planning of systems. Any electronic system acquired or developed requires a Disposition Plan approved by the appropriate Senior Records Officer.

### Program Manager

Program managers have a primary responsibility for creating, maintaining, protecting, and disposing of records for their program area in accordance with GSA policy. Program Manager's responsibilities include:

- Creating the records needed to ensure adequate and proper documentation of their area of responsibility.
- Implementing procedures to protect records from theft, loss, unauthorized access, and unauthorized removal.
- Cooperating with Records Management Coordinators in requests for information and in the management of records.
- Notifying their Records Management Coordinators of organization or program changes that will result in establishment of new types of records, new uses of existing records, the transfer or termination of records no longer required, or a needed increase or decrease in the retention time of the records.

### Office of the General Counsel

The Office of General Counsel notifies the Agency Records Officer of record litigation holds and other records freezes, and provides instructions directly to affected employees on retaining any potentially relevant records.

## **Appendix A. - Authorities**

**Authorities.** According to Federal law (44 U.S.C. 2901), records management means: “the planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to records creation, records maintenance and use, and records disposition in order to achieve adequate and proper documentation of the policies and transactions of the Federal Government and effective and economical management of agency operations.”

GSA's Records Management Program operates under the following authorities:

- 44 U.S.C. Chapter 31 – Records Management by Federal Agencies (Federal Records Act): <http://www.archives.gov/about/laws/fed-agencies.html>
- 44 U.S.C. Chapter 33 – Disposal of Records:  
<http://www.archives.gov/about/laws/disposal-of-records.html>
- 44 U.S.C. Chapter 35 – Coordination of Federal Information Policy (Paperwork Reduction Act of 1980, as amended, Paperwork Reduction Reauthorization Act of 1995, and Government Paperwork Elimination Act):  
<http://www.archives.gov/about/laws/fed-information-policy.html>
- 36 CFR Chapter XII, Subchapter B – Records Management:  
<http://www.archives.gov/about/regulations/subchapter/b.html>
- 36 CFR 1220.34 - What must an agency do to carry out its records management responsibilities: <http://www.law.cornell.edu/cfr/text/36/1220.34>
- OMB Circular A-123 – Management's Responsibility for Internal Control:  
[http://www.whitehouse.gov/omb/circulars/a123/a123\\_rev.html](http://www.whitehouse.gov/omb/circulars/a123/a123_rev.html)
- OMB Circular A-130 – Management of Federal Information Resources:  
<http://www.whitehouse.gov/omb/circulars/a130/a130trans4.html>
- Executive Order 12656 – Assignment of Emergency Preparedness Responsibilities Part 18, Sec. 1801(3):  
<https://www.fas.org/irp/offdocs/EO12656.htm>
- 2430.1 ADM – General Services Administration Continuity Program:  
<https://insite.gsa.gov/portal/content/521730>
- 2450.1 ADM – Alternate Sites for Continuity of Operations Plan (COOP) Relocation: <https://insite.gsa.gov/portal/content/518978>

- Federal Emergency Management Agency (FEMA) Federal Preparedness Circular 65 - Federal Executive Branch Continuity of Operations (COOP):  
<http://www.fas.org/irp/offdocs/pdd/fpc-65.htm>
- Federal Records Act of 1950 (44 U.S.C. chs. 21, 29):  
<http://www.gpo.gov/fdsys/browse/collectionUSCode.action?collectionCode=USCODE>
- Freedom of Information Act (FOIA) (5 U.S.C. 552) and the Privacy Act (PA) of 1974 regulate public access to Federal records:  
<http://www.gpo.gov/fdsys/browse/collectionUSCode.action?collectionCode=USCODE>
- 18 U.S.C. 2071 - Penalties for unlawfully removing or destroying records:  
<http://www.gpo.gov/fdsys/granule/USCODE-2011-title18/USCODE-2011-title18-part1-chap101-sec2071/content-detail.html>
- Executive Memorandum M-12-18, Managing Government Records Directive:  
<http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>

#### Related documents.

The following publications prescribe actions and operational procedures to be followed by GSA:

- ISO 15489-1:2001 – Information and Documentation – Records Management – Part 1: General
- ISO/TR 15489-2:2001 – Information and Documentation – Records Management – Part 2: Guidelines
- Memo on Increasing Data Sharing, Transparency and Reuse at GSA – February 14, 2014; can be found at GSA's Records Management website:  
<http://insite.gsa.gov/portal/content/500582>
- CIO P 2100.1I – GSA Information Technology (IT) Security Policy; can be found at GSA's Records Management website:  
<http://insite.gsa.gov/portal/content/500582>
- Additional documents, including forms, and other relevant information are maintained on GSA's Records Management website:  
<http://insite.gsa.gov/portal/content/500582>

## **Appendix B. - Definitions**

### **Records**

- Definition. The term "records" according to 44 U.S.C. 3301, includes all books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, that are:
  - Made or received by an agency of the United States Government under Federal law or in connection with the transaction of public business; and
  - Preserved or appropriate for preservation by that agency (or its legitimate successor) as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of data in them.
- If documentary material is made or received by a GSA associate when performing their assigned duties, it is presumed to be a record, and safeguards should be instituted to prevent unauthorized destruction/deletion or removal from GSA electronic systems or physical files.
- Examples. The following are examples of records:
  - The official file copy of any Government business document;
  - Any classified document;
  - Any document containing information required to transact the official business of GSA;
  - Any document used in or documenting an official decision of the agency;
  - Any information provided to GSA that has been identified as a trade secret or proprietary information; and
  - Electronic data in shared information systems may be records; it is up to system owners to determine what record types exist in the system.
  - With email, it is up to the GSA employee to determine if the email is a record or not. Any email meeting the definition of a record, such as those requiring a decision or authorizing an action.
  - When a record is migrated from one format or media to another, both the data and associated metadata/associated supporting and descriptive data, (such as the author and date of an email), should be migrated to the new storage media or formats so that records in their totality are retrievable and usable as

long as needed to conduct agency business and to meet National Archives and Records Administration approved dispositions.

#### Non-record materials and copies of records

- Definition: Informational materials kept for convenience of reference.
- Examples. The statute that defines records (44 U.S.C. 3301; cited in par. 5a) sets out three types of non-record materials:
  - Extra copies of documents and other materials that an associate drafts, signs, reviews, or otherwise acts upon, provided that the record copies are properly filed;
  - Library materials acquired solely for reference; and
  - Stocks of forms, publications and processed documents.

#### Personal files

- Definition: Documentary materials containing information that is created and maintained solely for personal use and reference.
- Examples. Papers that may be considered personal include:
  - Personal calendars, appointment books, schedules, and diaries created solely for the convenience of the GSA associate in managing his/her time;
  - Documentary materials created on Government time, using Government equipment and supplies, which do not document Government activity and therefore do not meet the standard for record status, or personal copies of records of interest to the associate; and
  - Personal files should be filed separately from the record, and marked as "Personal files."



## **Appendix C. - Required Records Management Program Training**

### **Records Management Training**

- Employees are required to take records management training each fiscal year to understand what constitutes a record, and how to manage records in accordance with GSA's recordkeeping requirements and Federal laws and regulations.
- New employees must take this training within the first 60 days of their employment start date. Records management training courses are available on GSA's Online University.
- Beginning in Fiscal Year (FY) 2014, the Agency Records Officer and Senior Records Officers are required to have a National Archives and Records Administration records management training certification. This certification should be obtained within one year of their designation.
- The Agency Records Officer and Senior Records Officer must stay current with all needed records management training including on National Archives and Records Administration Bulletins, National Archives and Records Administration's Electronic Records Archives (NARA ERA) and National Archives and Records Administration's Archives and Records Centers Information System (NARA ARCIS).